

**DEPARTMENT OF TRANSPORTATION
UNITED STATES COAST GUARD**

U.S. Coast Guard (G-MMT-3)
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NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 9-80

Subj: Servicing Requirements of Inflatable Liferrafts

Ref: (a) Code of Federal Regulations, Title 46-Shipping: 160.051-6

1. **PURPOSE.** This Circular explains the restrictions that apply to the servicing of Coast Guard-approved inflatable liferafts.
2. **BACKGROUND.** The above reference requires each manufacturer of a Coast Guard-approved inflatable liferaft to provide servicing facilities for the raft's annual overhaul and testing. The servicing of a manufacturer's rafts is restricted to servicing facilities affiliated with that manufacturer, facilities which have been selected by the manufacturer, inspected by the Coast Guard, and issued letters of approval by the Commandant. This arrangement of manufacturer-selection of the facilities and their inspection by the Coast Guard ensures that a servicing facility will have: (a) employees who have been trained in the intricacies of a particular make of rafts; and (b) the necessary spare parts, equipment, and instructional materials for maintaining the rafts.
3. **DISCUSSION:**
 - a. The servicing of a raft must take place in servicing facilities affiliated with its manufacturer. The facilities affiliated with each manufacturer are given in the Coast Guard publication COMDTINST M16714.3 (old CG-190): Equipment Lists. Adherence to this procedure is necessary because of differences in the rafts' replacement parts and packing procedures. Unless a raft is overhauled and repacked by personnel trained to work on it, mistakes can occur. A company manufacturing rafts will waive responsibility for a unit serviced by a facility that is not listed for the company in the above publication.
 - b. Even though a servicing facility may be covered by a letter of approval issued by the Commandant of the Coast Guard, such letter does not give blanket approval for the servicing of all makes of rafts. Therefore, persons charged with sending rafts ashore for annual servicing should give attention to the raft manufacturer-servicing facility relationship. The Coast Guard has been advised of packing errors found in the rafts of both foreign and domestic origin, some of which resulted from the activities of facilities not complying with the above arrangements and which took place without the knowledge of the Officer in Charge, Marine Inspection. The activities of such "pirate" servicing facilities expose shipboard personnel to the hazards that might follow the failure of a raft to inflate in an emergency.
4. **ACTION.** The Coast Guard urges vessel operators, ship masters, and port agents to give careful attention to the selection of servicing facilities for inflatable liferafts. Such attention will provide for the servicing of a raft by a facility that is affiliated with the raft's manufacturer. The

information relating the raft manufacturers with their affiliated servicing facilities is given in the Coast Guard publication COMDTINST M16714.3 (old CG-190): Equipment Lists.


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